

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE ABI JAOUDI AND AZAR TRADING CORP.,	:	CIVIL ACTION
:		:
Plaintiff,	:	:
:		:
v.	:	:
:		:
CIGNA WORLDWIDE INS. CO., et al.,	:	NO. 91-6785-PSD
:		:
Defendants.	:	:
:		:

**NOTICE OF SUPPLEMENTAL AUTHORITY OF NON-PARTY
RESPONDENTS MARTIN KENNEY AND JOSEPH H. LILLY, III.**

On April 17, 2013, Non-Party Respondents MARTIN KENNEY and JOSEPH H. LILLY, III became aware of the following authority relevant to the motions currently before the court.

On April 17, 2013, the United States Supreme Court issued its opinion in *Kiobel v. Royal Dutch Petroleum Co.*, ____ U.S. ___, 2013 WL 1628935 (copy attached as Exhibit 1). The case reaffirms the rule announced in *Morrison v. National Australia Bank, Ltd.*, 561 U.S. ___, 130 S.Ct. 2869 (2010), that the laws of the United States do not apply to actions taken by foreign nationals in foreign countries absent Congress so stating in the law. *Kiobel*, Slip op. at 4. It also reaffirms the “presumption that United States law governs domestically but does not rule the world.” *Id.*

In their briefs filed on April 15, 2013 (Dkt. Nos. 375 and 376), Non-Party Respondents Martin Kenney and Joseph Lilly cited and relied upon *Morrison* for the point that the laws and rules relating to criminal or civil contempt do not apply extraterritorially. They hereby cite the *Kiobel* opinion as additional authority.

Respectfully submitted,

/s/ Robert C. Clothier

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LILLY, III

Dated: April 18, 2013

CERTIFICATE OF SERVICE

I hereby certify, that on this date a true and correct copy of the foregoing Notice Of Supplemental Authority Of Non-Party Respondents Martin Kenney And Joseph H. Lilly, III, was served via the Court's ECF filing system (unless otherwise stated) upon the parties listed on the attached service list:

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